

20 December 2012

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Regarding: WT Docket Number 11-49

Dear Ms. Dortch,

My company, Blaze Broadband, provides high speed Internet to homes and businesses in Virginia using the 900 MHz unlicensed band and I am very concerned our customers will loose their Internet access should Progeny start broadcasting because of the unacceptable level of interference they will create. The 900 MHz band is of critical importance to Blaze Broadband and by extension, our customers, because its low frequency imparts the ability to penetrate the heavy trees in our service area. There is no other unlicensed spectrum that can be used for these customers should the 900 band be consumed by Progeny. Please deny Progeny's request for a nationwide license inside the unlicensed 900 MHz Part 15 band and save our Internet.

We use Cambium Canopy equipment extensively in the 900 MHz band and we have studied carefully the results of the joint test WISPA and Progeny prepared and submitted to the FCC. While our equipment currently uses only horizontal polarity, the evidence clearly shows Progeny's vertical polarization is not sufficient to insulate our customers. Our Access Points are typically mounted on high terrain and will be especially vulnerable to noise from multiple Progeny base stations. Progeny's test results show our customers would loose a significant portion of their throughput in 2/3rds of the band. The remaining lower third is just not sufficient to support our existing customer base and would completely derail our ongoing efforts to expand our coverage area to delivery service to more people. Wireline alternatives just don't exist in most of our territory. As a result, service to all customers would be dramatically slowed, all would see reduced reliability, and many would loose their Internet access entirely.

This adverse impact on Blaze Broadband would be amplified many times over at a thousand other WISPs around the Country that rely on the 900 MHz band. At a time when the FCC has pledged to free up hundreds of megahertz of spectrum to improve broadband access in America it would be a huge step backwards to cut off this critical sub-GHz spectrum relied on by so many Americans.

Sincerely,

Paul Conlin, President.

Blaze Broadband